



Park County Environmental

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SENATE NATURAL RESOURCES

EXHIBIT NO. 5

DATE 1/14/11

BILL NO. SB 89

PH: 406-222-4109

January 7, 2011

Dear Natural Resources Committee;

I am writing to you concerning the proposed changes in SB89---Reducing DEQ and local sanitation review times.

I am a sanitarian in Park County. I am contracted to perform the sanitation review for subdivisions. Reducing the review time from 50 to 20 days for local reviewers would make it very difficult for me to meet the review deadline. In the review process I like to visit the site and I like to have time to look at all aspects of the project during my review. I also have many other duties each day besides subdivision review as a county sanitarian! I have many interruptions during the day because citizens come into my office with questions. I have inspections to do. And last, I have personal needs like vacations and holidays. This means that there are cases when I need the whole 50 days to find the time to get a file reviewed.

A typical subdivision application requires a minimum of 3-4 hours in the office for me to review a file. This does not include the site visit. A site visit often requires another 3-4 hours, including travel and time on site. With all my duties, 20 days would make it difficult for me to find the time to do an adequate review.

Is the motivation behind shortening the review time complaints from developers that the review process takes too long? Then, I suggest the committee look at how long it takes consultants to respond to denial letters from sanitation reviewers, also, when trying to improve the efficiency of the review process. I have had the experience of consultants blaming me for the length of time a project is taking, when they are talking with an applicant that hired them ---when in fact the consultant turned in a poor submittal and has been taking weeks, or even months, to address the points in a denial letter I have sent them. I suggest the committee look at setting a time line for consultants responding to a denial letter if the goal is to streamline the review process.

It is important to Park County to keep the contract for performing sanitation review because we feel, as a local entity, we have a better opportunity to protect the public's health and the environment in our county than a reviewer in Helena. We are immediately available to visit sites; we know the area better than state reviewers; we are more readily available to local consultants, developers and property owners to answer questions and concerns. **Please do not hamper Park County's ability to perform this vital function for our community by creating an impossible time frame for the sanitation review process.**

Thank you for your time and consideration.

Sincerely,

*Barbara Woodbury R.S.*

Barbara Woodbury, R.S., M.P.H., C.F.M.

Director of Environmental Health

Park County, MT

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